

MELINDA HAAG (CABN 132612)  
United States Attorney

MIRANDA KANE (CABN 150630)  
Chief, Criminal Division

CAROLYN SILANE (NYBN 459235)  
Special Assistant United States Attorney  
450 Golden Gate Ave., Box 36055  
San Francisco, California 94102  
Telephone: (415) 436-7200  
Fax: (415) 436-7234  
E-Mail: carolyn.silane@usdoj.gov

Attorneys for Plaintiff

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA,  
  
Plaintiff,  
  
v.  
  
G. JOHN ROY PANELLI,  
  
Defendant.

No. CR 12-71000 MAG  
  
STIPULATION REQUESTING  
PROTECTIVE ORDER, AND  
~~PROPOSED~~ ORDER

The parties respectfully stipulate as follows:

1. The United States wishes to turn over discovery materials in this matter to counsel for defendant G. John Roy Panelli. This material includes information that the United States considers inappropriate for public distribution because it includes personal information, including social security numbers and credit card information, or is otherwise sensitive. Accordingly, the United States respectfully asks the Court to enter the protective order set forth below.
2. Defendant's counsel stipulates to entry of the proposed protective order set forth below.

STIP. REQUESTING PROTECTIVE ORDER, AND [PROPOSED] ORDER  
CR 12-71000 MAG

3. Accordingly, the parties respectfully ask the Court to enter the proposed protective order set forth below.

DATED: October 25, 2012

/s/  
CAROLYN SILANE  
Special Assistant United States Attorney

DATED: October 25, 2012

/s/  
DOUGLAS HORNGRAD  
Attorney for Defendant

//

//

//

//

//

//

//

//

//

//

//

//

//

//

//

//

//

//

//

//

1 **[PROPOSED] PROTECTIVE ORDER**

2 The United States has moved for a protective order limiting the uses to which discovery  
3 materials in this case may be put. The Court finds that there is good cause for issuance of such a  
4 protective order. Therefore, **IT IS ORDERED THAT:**

5 1. The contents of the discovery materials in this case shall not be disclosed in any  
6 form to any other person by defense counsel except to the client, any investigator(s) for the client,  
7 and any other members of defendant's trial team including expert witnesses, and then only for the  
8 specific purposes relating to defending the client in this case.

9 2. Unless expressly authorized by this Court, no information derived from the  
10 discovery materials which are the subject of this order may be disclosed to any individual or  
11 entity for any other use.

12 3. This Order applies to all attorneys associated with the above case who have  
13 knowledge of this Order regardless of the nature of their involvement in the case. This Order  
14 shall be binding on all subsequent attorneys who represent the defendant in this case or any other  
15 person who comes into possession of the discovery materials disclosed pursuant to this Order.

16 4. All persons who come into possession of the discovery materials disclosed  
17 pursuant to this Order are required to advise any other persons receiving disclosure of any of the  
18 discovery materials of the terms of this Order.

19 5. A willful violation of this Order shall constitute a criminal contempt of Court for  
20 which sanctions are provided by law. The parties who agree to receive information which is  
21 subject to this Order agree that this Court has jurisdiction to enter this Order.

22  
23 Dated: 10/30/12

